Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Philip Morris USA, Inc.

Facility Name: Philip Morris USA, Inc. – Park 500 Facility Location: 4100 Bermuda Hundred Road

Chester, VA 23836-3244

Registration Number: 50722

Permit Number: PRO50722 (50722-registration #)

December 22, 2004

Issued Date

January 1, 2005 Effective Date

January 1, 2010 Expiration Date

Robert G. Burnley

Director, Department of Environmental Quality

a: _____

Signature Date

Table of Contents, 2 pages Permit Conditions, 49 pages

Table of Contents

I.	FACILITY INFORMATION	1
II.	EMISSION UNITS	3
III.	FUEL BURNING EQUIPMENT REQUIREMENTS – (EMISSION UNIT ID#: B1, BO 0501)	8
A B C	LIMITATIONS	8
IV.	FUEL BURNING EQUIPMENT REQUIREMENTS – (EMISSION UNIT ID#B2, BO 0201)	
A B		
v.	FUEL BURNING EQUIPMENT REQUIREMENTS – (EMISSION UNIT ID# B3, BO 0301)	.17
A B C		. 18
SIL HA	COAL HANDLING AND STORAGE EQUIPMENT (COAL CAR SHAKERS, COAL CRUSHERS RIOUS CONVEYORS AND SILOS), ASH HANDLING AND STORAGE EQUIPMENT (CYCLONES OS, AND CONVEYING SYSTEMS), AND FLY ASH HANDLING SYSTEM (SUBSET OF ASH NDLING EQUIPMENT) REQUIREMENTS: (EMISSION UNIT ID#S: CH0101, AH0101, AND AH010 (CK ID# AE-43)	5, 01
A B		
DC	COMBUSTION EQUIPMENT (GENERATORS) REQUIREMENTS – (EMISSION UNIT ID# W1,0101, AND W2, EG0101) AND RECEIVING AND BLENDING AREA – (EMISSION UNIT ID#S: 0401 TO DC0408, BW0401 TO BW0408, DC0301 TO DC0306 AND DC0207, BW0301 TO BW0307, 0201 TO HM0204 AND HM0101 AND BC0301)	
	LIMITATIONS	
В		
ANI DT(L. PULPING (PNEUMATIC TRANSFER) (EMISSION UNIT ID#: L1CY0101, L1CY0102, L2CY0102) L2CY0102), TOBACCO DRYING REQUIREMENTS— (EMISSION UNIT ID# L1 DD0101, L1 D101, L1 DR0101, L2DD0101, L2DT0101, AND L2DR0101) AND PACKING REQUIREMENTS— USSION UNIT ID# L1 PP0101 & L1PP0102 AND L1 PP0201 & L1PP0202)	
•	LIMITATIONS	
B		
	TOBACCO DRYING AND PACKING AND PROCESS VENTILATION PROCESS EQUIPMENT QUIREMENTS – (EMISSION UNIT ID# L3 DD0101, L3 DT0101, L3 DR0101, AND L3 PP0101, PP010 P0103)	02,
A B	LIMITATIONS	. 26
MT	DRY TOBACCO FLAVORING OPERATION PROCESS EQUIPMENT WHICH INCLUDES THE ENDING AND HOLDING TANKS REQUIREMENTS – (EMISSION UNIT ID# L3, TK4501, L3 0801), DRY TOBACCO FLAVORING DUMP STATION (EMISSION UNIT ID#: L3 TK4601) AND O PROPYLENE GLYCOL STORAGE TANKS (EMISSION UNIT ID#: TK4901 & TK4902)	.27

Α.	LIMITATIONS	
B.	MONITORING AND RECORDKEEPING	28
XI.	FACILITY WIDE CONDITIONS	30
A.	REQUIREMENTS BY REFERENCE	
B.	LIMITATIONS	
C.	MONITORING AND RECORDKEEPING	30
D.	TESTING	31
XII.	INSIGNIFICANT EMISSION UNITS	32
XIII.	GENERAL CONDITIONS	39
Α.	FEDERAL ENFORCEABILITY	39
В.	PERMIT EXPIRATION	
C.	RECORDKEEPING AND REPORTING	
D.	ANNUAL COMPLIANCE CERTIFICATION	
E.	PERMIT DEVIATION REPORTING	
F.	FAILURE/MALFUNCTION REPORTING	
G.	SEVERABILITY	43
H.	DUTY TO COMPLY	43
I.	NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE	43
J.	PERMIT MODIFICATION	44
K.	PROPERTY RIGHTS	
L.	DUTY TO SUBMIT INFORMATION	44
M.	DUTY TO PAY PERMIT FEES	
N.	FUGITIVE DUST EMISSION STANDARDS	
O.	STARTUP, SHUTDOWN, AND MALFUNCTION	45
P.	ALTERNATIVE OPERATING SCENARIOS	
Q.	INSPECTION AND ENTRY REQUIREMENTS	
R.	REOPENING FOR CAUSE	46
S.	PERMIT AVAILABILITY	
T.	TRANSFER OF PERMITS	
U.	MALFUNCTION AS AN AFFIRMATIVE DEFENSE	
V.	PERMIT REVOCATION OR TERMINATION FOR CAUSE	
W.	DUTY TO SUPPLEMENT OR CORRECT APPLICATION	
X.	STRATOSPHERIC OZONE PROTECTION	
Y.	ASBESTOS REQUIREMENTS	
Z.	ACCIDENTAL RELEASE PREVENTION	
AA.		
BB.	EMISSIONS TRADING	49

I. Facility Information

Permittee

Philip Morris USA, Inc. P.O. Box 26603 Richmond, VA 23261

Responsible Official

Mr. Gregory H. Ray Director of Operations, Park 500

Facility

Philip Morris USA, Inc. – Park 500 4100 Bermuda Hundred Road Chester, VA 23836-3244

Contact Person

Ms. Patricia Bruce Assoc. Staff Engineer 804 -274-3649

AIRS Identification Number: 51-041-0081

Facility Description:

SIC Code Description:

Major Group 21: Tobacco Products

2141 Tobacco Stemming and Redrying

Establishments primarily engaged in the stemming and redrying of tobacco or in manufacturing reconstituted tobacco.

Tobacco thrashing (mechanical stemming)

Tobacco, stemming and redrying of

Facility Description:

RL Plant:

Ground tobacco components are combined with a liquid solution to produce a reconstituted tobacco "sheet" commonly called Reconstituted Leaf (RL) at the Philip Morris USA, Incorporated (PMUSA, Inc.) Park 500 Complex in Chesterfield County, Virginia (SIC Code 2141). At the Park 500 Complex RL facility, tobacco components are unpacked from containers, crushed, and blended together in the Receiving and Blending area. In the Stock Preparation/Pulping area, these raw materials are combined with water and processed to

Page 2

separate fibers from the liquid. The resulting stock is applied onto sheet forming equipment; tobacco solubles and flavors are applied; and the sheet is dried and cut into small pieces. The completed RL product is then packed into containers for shipment to a warehouse or another PMUSA, Inc. facility.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burnin		ent					
Park 500 – l	RL Plant						
B1 BO 0501	AE-38	Babcock & Wilcox Boiler, constructed in 1996	143 mmbtu/hr (Manufacturer's Continuous Rating) MCR when burning fuel oil No. 2 F.O. (P) No. 6 F.O. (S) 146 mmbtu/hr when burning Nat. Gas (S) & LP Gas (S)	Multicyclone Joy Mfg. 35-7, D.E. = 90%	CY0101	PM	12/11/95 Permit
B2 BO 0201	AE-42	Babcock &Wilcox Boiler (Stirling Power) – Wall- fired, constructed in 1978	237 mmbtu/hr (Manufacturer's Continuous Rating) MCR Bit. Coal (P) No. 6 F.O. (S) No. 2 F.O. (S)* *: No. 2 is for ignition & flame stabilization	Electrostatic Precipitator (cold side) Flakt FAA 4x28-63-80-2, D.E. = 99.6%	PE0101	PM	12/5/77 Permit & 6/26/81 Permit amendment

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
B3 BO 0301	AE-47	Combustion Engineering Tangentially Fired Boiler, constructed in 1982	237 mmbtu/hr (Manufacturer's Continuous Rating) MCR Bit. Coal (P) No. 6 F.O. (S) No. 2 F.O. (S)* *: No. 2 is for ignition & flame stabilization	Electrostatic Precipitator (cold side) Flakt FAA 4x28-63- 80-2, D.E. = 99.6%	PE0201	PM	8/23/04 Permit
Generators							
024W1 EG0101	AE-I1	Water Treatment Plant Diesel Generator, constructed in 1981	Electrical Power 2,928 kW/hr Output BHP 1,490	-	-	-	8/18/04 Permit
024W2 EG0101	AE-77	Waste Water Treatment Plant Diesel Generator, Cummins, constructed in 1981	Electrical Power 2,928 kW/hr Output BHP 1,490	-	-	-	8/18/04 Permit
Coal and Ash Handling Operations							
	Fug.			Wet Suppression , D.E. = 90%		PM	8/23/04
	AE-81	Coal Handling and Storage Equipment	300 tons/hr (combined	Baghouse D.E. = 99%	B2BH0801	PM	12/5/77 and 8/23/04
CH0101	AE- B1-B3, AE- A1-A9	(coal car shakers, coal crushers, various conveyors and coal silos)	between the two permits)	Twelve Baghouses D.E. = 99%	B2BH0101 through B2BH0112	PM	12/5/77 and 8/23/04

Emission	Stack	Emission Unit Description	Size/Rated	Pollution Control Device (PCD)	PCD ID	Pollutant	Applicable Permit
Unit ID	ID	Emission Unit Description	Capacity*	Description*		Controlled	Date
	AE-48	Ash Handling and Storage	30 tons/hr	Baghouse D.E. = 99%	B2BH0601		
	AE-83	Equipment (cyclones, silos, and	(combined between the	Baghouse D.E. = 99%	B2BH0501	PM	12/5/77 and 8/23/04
AH0101	AE-45	conveying systems	two permits)	Baghouse D.E. = 99%	B2BH0701		
	AE-43	Fly Ash Handling System (subset of Ash Handling Equipment)	15 tons/hr	Baghouse D.E. = 99%	B2BH0301	PM	8/23/04
Tobacco Pro	ocessing E	Equipment					
(DC0401 to DC0408) (BW0401 to DW04001							
BW0408) (DC0301 to DC0306 and DC0207) (BW 0301 to BW0307)	AE-77 & AE-78	Receiving and Blending Area (Tobacco Receiving and Blending Equipment)	80.65 tobacco process P5BA units/hr	Two Baghouses, D.E.= 99% & D.E.= 99%	L1BH0501 & L1BH0601	PM	8/18/04 Permit
(HM0201 to HM0204 and HM0101) And BC0301							

Page	6
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Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date	
L1CY0101 L1CY0102 L2CY0101 L2CY0102	AE-01	Pulping (pneumatic transfer)	20.76 tobacco process P5FA units/hr	Four Baghouses D.E. = 99%	L1BH0301 L1BH0302 L2BH0301 L2BH0302	PM	7/9/74 Permit as updated in 12/5/77 Permit	
L1 DD0101	AE-08	Tobacco Drying		Mechanical Scrubber D.E.= 90/40%	L1SC0101	PM/VOC	7/9/74 Permit as updated in 12/5/77 Permit	
L1 DT0101	AE-09	Tobacco Drying		Orifice Scrubber, D.E.= 90/40%	L1SC0201	PM/VOC	7/9/74 Permit as updated in 12/5/77 Permit	
L1 DR0101	AE-10	Tobacco Drying	86.94 tobacco process P5FA units/hr		Orifice Scrubber, D.E.= 90/40%	L1SC0301	PM/VOC	7/9/74 Permit as updated in 12/5/77 Permit
L2 DD0101	AE-22	Tobacco Drying		Mechanical Scrubber, D.E.= 90/40%	L2SC0101	PM/VOC	12/5/77 Permit	
L2 DT0101	AE-23	Tobacco Drying		Orifice Scrubber, D.E.= 90/40%	L2SC0201	PM/VOC	12/5/77 Permit	
L2 DR0101	AE-26	Tobacco Drying		Orifice Scrubber, D.E.= 90/40%	L2SC0301	PM/VOC	12/5/77 Permit	
L1 PP0101 & PP0102 L1 PP0201 & PP0202	AE-11	Packing	53.77 tobacco process P5FA units/hr	Baghouse, D.E.= 99%	BH0701	PM	7/9/74 Permit as updated in 12/5/77 Permit	
L3 DD0101	AE-32	Tobacco Drying (Dryer)	26.88 tobacco	Mechanical Scrubber D.E.= 90/40%	L3SC0101	PM/VOC	6/30/04 Permit	
L3 DT0101	AE-33	Tobacco Drying (Dryer)	process P5PA units/hr	Orifice Scrubber, D.E.= 90/40%	L3SC0201	PM/VOC	6/30/04 Permit	
L3 DR0101	AE-34	Tobacco Drying (Dryer)	umts/m	Cyclone Scrubber, D.E.= 90/40%	L3SC0301	PM/VOC	6/30/04 Permit	

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
L3 PP0101, PP0102, & PP0103	AE-35	Packing and Process Ventilation (Packers)	26.88 tobacco process P5PA units/hr	Baghouse, D.E.= 99%	BH0301	PM	6/30/04 Permit
Other Proce	ess						
L3TK4501		2,400 gallon Blending Tank 2,400 gallon Holding Tank	740 gal/hr associated with dry flavor operation				
L3TK4601		Dry Tobacco Flavoring Dump Station	1,000 lbs/hr	Fabric Filter, D.E. = 99%	L3SF0301	PM	8/19/04 Permit
L3 TK4901 L3 TK4902		8,000 gallon (each) Propylene Glycol Storage Tanks					

^{*}The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.
* D.E.: Design Efficiency

Page 8

III. Fuel Burning Equipment Requirements – (emission unit ID#: B1, BO 0501)

A. Limitations

1. Nitrogen oxide emissions from the gas- and oil-fired boiler (emission unit ID#: B1, BO 0501) shall be controlled by the use of flue gas recirculation. The boiler (emission unit ID#: B1, BO 0501) shall be provided with adequate access for inspection.

(9 VAC 5-80-110 and Condition 3 of 12/11/95 Permit)

Sulfur dioxide emissions from the gas- and oil-fired boiler (emission unit ID#: B1, BO 0501) shall be controlled by the use of low-sulfur fuel.
 (9 VAC 5-80-110 and Condition 4 of 12/11/95 Permit)

- Particulate emissions from the gas- and oil-fired boiler (emission unit ID#: B1, BO 0501) shall be controlled by the use of a multicyclone.
 (9 VAC 5-80-110 and Condition 5 of 12/11/95 Permit)
- 4. Boiler (emission unit ID#: B1, BO 0501) emissions shall be controlled by proper operation and maintenance. Boiler (emission unit ID#: B1, BO 0501) operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at minimum. (9 VAC 5-80-110 and Condition 28 of 12/11/95 Permit)
- 5. The approved fuels for the gas- and oil-fired boiler (emission unit ID#: B1, BO 0501) are natural gas, LP gas, distillate oil, and residual oil. Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 or 2 under the American Society for Testing and Materials, ASTM D396-78 "Standard Specification for Fuel Oils". Residual oil is defined as fuel oil that meets the specifications for fuel oil numbers 4, 5, or 6 under the American Society for Testing and Materials, ASTM D396-78 "Standard Specification for Fuel Oils". A change in the fuels may require a permit to modify and operate.

 (9 VAC 5-80-110 and Condition 7 of 12/11/95 Permit)
- 6. The gas-and oil-fired boiler (emission unit ID#: B1, BO 0501) shall consume no more fuel than specified below:

Natural Gas $0.140~{\rm MMft^3/hr}$ $1,035~{\rm MMft^3/yr}$ or ${\rm or}$ LP Gas $1.554~{\rm Mgal/hr}$ $11,470~{\rm Mgal/yr}$

Distillate Oil (#2 Fuel Oil)	1.036	Mgal/hr	4,647	Mgal/yr
		or		
Residual Oil (#6 Fuel Oil)	0.966	Mgal/hr	2,230	Mgal/yr

If a combination of fuels is used, the annual heat input shall not exceed 1.253×10^{12} Btu based on 1,020 MMBtu/MMft³ of natural gas, 92 MMBtu/Mgal LP gas, 138 MMBtu/Mgal No.2 fuel oil and 148 MMBtu/Mgal No. 6 fuel oil. Monthly records of emissions shall be maintained to ensure compliance with Condition III.A.12. (9 VAC 5-80-110, and Condition 9 of 12/11/95 Permit)

- 7. Except as specified in this permit, the gas-and oil-fired boiler (emission unit ID#: B1, BO 0501) is to be operated in compliance with Federal emissions requirements under 40 CFR 60, Subpart Db.
 - (9 VAC 5-80-110 and Condition 10 of 12/11/95 permit.)
- 8. Emissions from the operation of the gas-and oil-fired boiler (emission unit ID#: B1, BO 0501) shall not exceed the limits specified below when firing natural gas:

	0.8 lbs/hr
	0.1 lbs/hr
0.125 lbs/MMBtu	18.3 lbs/hr
	5.8 lbs/hr
ondition 11 of 12/11/95 Permi	0.3 lbs/hr t)

9. Emissions from the operation of the gas-and oil-fired boiler (emission unit ID#: B1, BO 0501) shall not exceed the limits specified below when firing LP gas:

TSP/PM-10		1.0 lbs/hr
Sulfur Dioxide		1.6 lbs/hr
Nitrogen Oxides (as NO ₂)	0.125 lbs/MMBtu	18.3 lbs/hr
Carbon Monoxide		5.1 lbs/hr

0.3 lbs/hr

		Page 1					
Volatile Organic Compounds		0.8 lbs/hr					
(9 VAC 5-80-110, and	(9 VAC 5-80-110, and Condition 12 of 12/11/95 Permit)						
10. Emissions from the operation of the gas-and oil-fired boiler (emission unit ID#: B1, BO 0501) shall not exceed the limits specified below when firing No. 2 fuel oil:							
TSP/PM-10	0.1 lbs/MMBtu	3.2 lbs/hr					
Sulfur Dioxide		71.5 lbs/hr					
Nitrogen Oxides (as NO ₂)	0.2 lbs/MMBtu	28.6 lbs/hr					
Carbon Monoxide		5.2 lbs/hr					
Volatile Organic Compounds		0.3 lbs/hr					
(9 VAC 5-80-110, NSI	PS D _b , and Condition 13	3 of 12/11/95 Permit)					
-	_	il-fired boiler (emission unit ID#: B1, below when firing No. 6 fuel oil:					
TSP/PM-10	0.1 lbs/MMBtu	3.2 lbs/hr					
Sulfur Dioxide		71.5 lbs/hr					
Nitrogen Oxides (as NO ₂)	0.4 lbs/MMBtu	57.2 lbs/hr					
Carbon Monoxide		4.9 lbs/hr					

(9 VAC 5-80-110, NSPS D_b , and Condition 14 of 12/11/95 Permit)

Volatile Organic Compounds

12. Annual emissions from the operation of the gas-and oil-fired boiler (emission unit ID#: B1, BO 0501) shall not exceed the limits specified below:

7.1 tons/yr TSP/PM-10

160.3 tons/yr Sulfur Dioxide

Page 11

Nitrogen Oxides

(as NO₂)

66.0 tons/yr

Carbon Monoxide

13.0 tons/yr

Volatile Organic

1.8 tons/yr

Compounds

(9 VAC 5-80-110 and Condition 15 of 12/11/95 Permit)

- 13. Visible Emissions from the gas- and oil-fired boiler (emission unit ID#: B1, BO 0501) stack shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 27 percent opacity. This condition applies at all times except during start-up, shutdown, or malfunction.
 (9 VAC 5-50-80, 9 VAC 5-80-110, NSPS D_b, and Condition 16 of 12/11/95 Permit)
- 14. The NO_x and opacity monitoring systems shall meet a minimum data availability of 90 percent of boiler operating hours on a 12-month rolling average. The NO_x monitoring system shall also meet the quality assurance requirements of 40 CFR Part 60, Appendix F.
 - (9 VAC 5-80-110 and Condition 26 of 12/11/95 Permit)
- 15. The maximum sulfur content of the oil to be burned in the gas-and oil-fired boiler (emission unit ID#: B1, BO 0501) shall not exceed 0.5 percent by weight per shipment. The permittee shall obtain a certification from the fuel supplier with each shipment of fuel oil. Each fuel supplier certification shall include the following:
 - a. The name of the fuel supplier,
 - b. The date on which the oil was received,
 - c. The volume of distillate or residual oil delivered in the shipment,
 - d. A statement that the oil complies with the American Society for Testing and Materials specifications for fuel oil numbers 1 and 2 or fuel oil numbers 4, 5, or 6, and
 - e. The sulfur content of the oil (% by weight).
 - (9 VAC 5-80-110 and Condition 27 of 12/11/95 Permit)

B. Monitoring and Recordkeeping

1. A continuous emission monitoring system (CEMS) consisting of a NO_x monitor and a suitable diluent monitor (either CO₂ or O₂), shall be installed on the gas- and oil-fired boiler (emission unit ID#: B1, BO 0501). Data from the NO_x CEMS shall be used to

Page 12

determine compliance with the emission standard (in lbs/MMBtu) on a 30-day rolling average as specified in Conditions III.A.8, 9, 10, and 11. The NO_x monitor shall be maintained, located and calibrated in accordance with approved procedures (ref. 40 CFR 60.13, 40 CFR 60 Subpart D_b , and 40 CFR 60, Appendix F). (9 VAC 5-80-110, NSPS D_b , and Condition 21 of 12/11/95 Permit)

- A continuous emission monitor shall be installed on the gas- and oil-fired boiler (emission unit ID#: B1, BO 0501) stack to measure and record opacity when the boiler (emission unit ID#: B1, BO 0501) is burning fuel oil.
 (9 VAC 5-80-110, NSPS D_b and Condition 22 of 12/11/95 Permit)
- 3. The continuous monitoring data generated by the NO_x and opacity monitors (emission unit ID#: B1, BO 0501) may, at the discretion of the Board, be used as evidence of violation of the emission and/or opacity standards. These data shall be kept on file and made available to the Department upon request. (9 VAC 5-80-110 and Condition 24 of 12/11/95 Permit)
- 4. An annual inspection shall be conducted on the multicyclone for the gas and oil-fired boiler (emission unit ID#: B1, BO 0501) by the permittee to ensure structural integrity.

(9 VAC 5-80-110 and Condition 5 of 12/11/95 Permit)

- 5. The permittee shall maintain records of the required training including a statement of time, place and nature of training provided. The permittee shall have available good written operating procedures and a maintenance schedule for the boiler (emission unit ID#: B1, BO 0501). These procedures shall be based on the manufacturer's recommendations, at minimum. All records required by this condition shall be kept on site and made available for inspection by the DEQ. (9 VAC 5-80-110 and Condition 28 of 12/11/95 Permit)
- 6. The permittee shall maintain records of all emission data and operating parameters for the gas-and oil-fired boiler (emission unit ID#: B1, BO 0501) necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
 - a. The monthly throughput of natural and LP gas and the monthly throughput of distillate and/or residual oil for the gas-and oil-fired boiler. The annual throughput shall be calculated as the sum of each consecutive twelve (12) month period.
 - b. The annual emissions of sulfur dioxides, nitrogen oxides, carbon monoxide and particulate calculated as the sum of each consecutive 12 month period.
 - c. All fuel supplier certifications.

Page 13

- d. CEM records.
- e. Opacity and NO_x monitor quarterly and semiannual excess emission reports.
- f. Records of all malfunctions of equipment which would cause a violation of any part of this permit.
- g. Operating procedures, maintenance schedules, and service records for all air pollution-related equipment.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (9 VAC 5-50-50, 9 VAC 5-80-110, and condition 30 of 12/11/95 Permit)

C. Reporting

- 1. The permittee shall submit excess NO_X and opacity emission reports (emission unit ID#: B1, BO 0501) to the Director, Piedmont Regional Office within 30 days after the end of each calendar quarter for which there are excess emissions as described in 40 CFR 60.49b (h) and (i). Details of the quarterly reports are to be arranged with the Director, Piedmont Regional Office. If there are no excess opacity or NOx emissions during the calendar quarter, the permittee shall submit a report semiannually stating that no excess emission occurred during the semiannual reporting period. The initial quarterly report shall be submitted to the Director, Piedmont Regional Office, postmarked by the 30th day of the third month following the completion of the initial performance test, unless no excess emissions occur during that quarter. The initial semiannual report shall be postmarked by the 30th day of the sixth month following the completion of the initial performance test, or following the date of the previous quarterly report, as applicable. Each subsequent quarterly or semiannual report shall be postmarked by the 30th day following the end of the reporting period. All quarterly and semiannual monitoring reports shall conform to the Continuous Emission Monitoring System Report Format enclosed with the permit dated 12/11/95 or other format as approved by DEQ.
 - (9 VAC 5-80-110, NSPS D_{b.} and condition 25 of 12/11/95 Permit)
- 2. The permittee shall submit fuel quality reports (emission unit ID#: B1, BO 0501) to the Director, Piedmont Regional Office within 30 days after the end of each calendar quarter. If no shipments of distillate or residual oil were received during the calendar quarter, the quarterly report shall consist of the dates included in the calendar quarter and a statement that no oil was received during the calendar quarter. If distillate or residual oil was received during the calendar quarter, the reports shall include:
 - a. The dates included in the calendar quarter;

- b. A copy of all fuel supplier certifications for all shipments of distillate and/or residual oil received during the calendar quarter or a quarterly summary from each fuel supplier that includes the information specified in Condition III.A. 15. for each shipment of distillate and residual oil; and,
- c. A signed statement from the owner or operator of the facility that the fuel supplier certifications or summaries of fuel supplier certifications represent all of the distillate oil burned or received at the facility.

(9 VAC 5-50-50, 9 VAC 5-80-110, and condition 31 of 12/11/95 Permit)

IV. Fuel Burning Equipment Requirements – (emission unit ID#B2, BO 0201)

A. Limitations

- Particulate emissions from the boiler (emission unit ID#: B2, BO 0201) will be controlled by a Belco electrostatic precipitator or equivalent. (9 VAC 5-80-110 and 12/5/77 Permit)
- 2. The approved fuels for the boiler (emission unit ID#B2, BO 0201) are coal, oil, or a combination. A change in the fuels may require a permit to modify and operate. (9 VAC 5-80-110 and 12/5/77 Permit)
- 3. The SO₂ Emissions from the operation of the boiler (emission unit ID#B2, BO 0201) shall not exceed the limitations specified below:
 - a. Sulfur Dioxide

Limit when Burning Coal*

2.1 lbs/MMBtu
Limit when Burning Oil*

2.51 lbs/MMBtu

*The limit when burning a mixture of coal and oil shall be determined using the following formula:

 $E(SO_2) = [2.51 (x) + 2.1 (y)]/100$ Where x = % heat input from oil Where y = % heat input from coal

b. The sulfur content of the coal burned on an annual average shall not exceed 1.2 percent. The sulfur content of the coal as supplied to the boiler (emission unit ID#B2, BO 0201) shall at no time exceed 1.4 percent.

(9 VAC 5-80-110, and Condition 12 of 12/5/77 Permit as amended on 6/26/81)

Page 15

- 4. Particulate emissions from the coal-oil boiler (emission unit ID#B2, BO 0201) shall be limited to 0.1 lb/MMBtu heat input.
 - (9 VAC 5-80-110, and Condition 10 of 12/5/77 permit.)
- 5. Nitrogen oxides emissions from the boiler (emission unit ID#B2, BO 0201) shall be limited to 0.70 lb/MMBtu heat input.
 - (9 VAC 5-80-110, and Condition 11 of 12/5/77 permit.)
- 6. Visible emissions from the boiler (emission unit ID# B2, BO 0201) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.

(9 VAC 5-50-80 and 9 VAC 5-80-110)

B. Monitoring and Recordkeeping

- Operation of the ESP (emission unit ID#B2, BO 0201) shall be monitored as according to the manufacturer's recommended procedures along with the use of the opacity monitoring system. (9 VAC 5-80-110)
- 2. A continuous monitoring system for measuring and recording the opacity of the boiler (emission unit ID#B2, BO 0201) stack emissions shall be installed, calibrated, maintained and operated by the owner or operator. The opacity monitoring system (emission unit ID#B2, BO 0201) shall meet a minimum data availability of 90 percent of boiler operating hours.
 - (9 VAC 5-80-110, and Condition 6 of 12/5/77 permit.)
- 3. The NO_x limitation of 0.70 lb/MMBtu shall be monitored by conducting a performance test for NO_x from the boiler (emission unit ID#, B2, BO 0201) to determine compliance with the emission limit contained in Condition IV.A.5. The test shall be performed, and reported within five years after permit issuance but in no event later than the permit expiration date. The test shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Piedmont Region. The permittee shall submit a test protocol at least 30 days prior to testing. One copy of the test results shall be submitted to the Piedmont Region within 60 days after test completion. (9 VAC 5-80-110)
- 4. A continuous monitoring system for measuring and recording the sulfur dioxide emissions from the boiler (emission unit ID#B2, BO 0201) stack shall be installed, calibrated, maintained and operated by the owner or operator. The sulfur dioxide emissions monitoring system shall meet a minimum data availability of 90 percent of boiler operating hours on a 12-month rolling average.

 (9 VAC 5-80-110, and Condition 8 of 12/5/77 permit.)

Page 16

- 5. The continuous emission monitoring systems for measuring opacity and sulfur dioxide emissions from the boiler (emission unit ID#B2, BO 0201) stack shall self calibrate every 24-hours using known standards. (9 VAC 5-80-110)
- 6. The permittee shall obtain a certification from the fuel supplier with each shipment of coal and/or oil. Each fuel supplier certification shall include the following:
 - a. The name of the fuel supplier,
 - b. The date on which the coal and/or oil was received,
 - c. The mass (i.e. tons) of coal and the volume of oil delivered in the shipment,
 - d. A statement that the oil complies with the American Society for Testing and Materials specifications for fuel oil numbers 1 and 2, and/or for residual oil.
 - e. The sulfur content of the oil.
 - f. The % sulfur and % ash content of the coal along with the Btu content per shipment.
 - (9 VAC 5-50-410 and 9 VAC 5-80-110)
- 7. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:
 - a. Opacity measurements and sulfur dioxide emission measurements from the continuous monitoring systems associated with conditions IV.B.2 and 4.
 - b. All self calibration records of the continuous monitoring systems as required by condition IV.B.6.
 - c. NO_x Stack Test Results as required by condition IV.B.3.
 - d. All monitoring performed for the ESP (emission unit ID#B2, BO 0201) as per the manufacturer's recommended procedures-.
 - e. All fuel supplier certifications.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50 and 9 VAC 5-80-110)

V. Fuel Burning Equipment Requirements – (emission unit ID# B3, BO 0301)

A. Limitations

1. **Emission Controls** – Particulate emissions from the boiler (emission unit ID#: B3 BO 0301) shall be controlled by an electrostatic precipitator designed at 99.6 percent control efficiency.

(9 VAC 5-80-110 and Condition 3 of 8/23/04 Permit)

- Fuel The approved fuel for the boiler (emission unit ID#: B3 BO 0301) is coal and no. 6 oil. A change in the fuel may require a permit to modify and operate.
 (9 VAC 5-80-110 and Condition 7 of 8/23/04 Permit)
- 3. **Fuel Throughput and Fuel Records** The boiler (emission unit ID#: B3 BO 0301) shall not burn more than 2,768,160 gallons of no. 6 oil per year. Records of oil usage shall be kept to enable annual oil usage to be calculated.

 (9 VAC 5-80-110 and Condition 8 of 8/23/04 Permit)
- 4. **Fuel** The annual average sulfur content of the coal burned shall not exceed 1.2 percent. The sulfur content of the coal as supplied to the boiler (emission unit ID#: B3 BO 0301) shall at no time exceed 1.4 percent.

(9 VAC 5-80-110 and Condition 9 of 8/23/04 Permit)

5. **Emission Limits** - Emissions from the operation of the boiler (emission unit ID#: B3 BO 0301) shall not exceed the limits specified below:

Particulate Matter	0.1 lbs/MMBtu	23.7 lbs/hr
Nitrogen Oxides (as NO ₂)	0.7 lbs/MMBtu	165.9 lbs/hr

Visible Emissions 20% opacity

Sulfur Dioxide

Limit when Burning Coal* 2.1 lbs/MMBtu 491.2 lbs/hr Limit when Burning Oil* 2.51 lbs/MMBtu 595.3 lbs/hr

*The limit when burning a mixture of coal and oil shall be determined using the following formula:

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E(SO_2) = [2.51 (x) + 2.1 (y)]/100 where x = % heat input from oil where y = % heat input from coal (9 VAC 5-80-110 and Condition 10 of 8/23/04 Permit)
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Page 18

B. Monitoring, Recordkeeping and Testing

- 1. Park 500 shall install and operate continuous emission monitoring systems (emission unit ID #: B3, BO 0301) for measuring opacity and sulfur dioxide. Park 500 shall install and operate these monitoring systems in accordance with the EPA requirements specified in 40 CFR Section 60.13 and Section 60.45. The opacity and sulfur dioxide emission monitoring systems shall meet a minimum data availability of 90 percent of boiler operating hours on a 12-month rolling average. (9 VAC 5-80-110 and Condition 6 of 8/23/04 Permit)
- 2. The NO_x limitation of 0.70 lb/MMBtu shall be monitored by conducting a performance test for NO_x from the boiler (emission unit ID#B3, BO 0301) to determine compliance with the emission limit contained in condition V.A.5. The test shall be performed, and reported within five years after permit issuance but in no event later than the permit expiration date. The test shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Piedmont Region. The permittee shall submit a test protocol at least 30 days prior to testing. One copy of the test results shall be submitted to the Piedmont Region within 60 days after test completion. (9 VAC 5-80-110)
- 3. The permittee shall obtain a certification from the fuel supplier with each shipment of coal and/or oil. Each fuel supplier certification shall include the following:
 - a. The name of the fuel supplier,
 - b. The date on which the coal and/or oil was received,
 - c. The mass (i.e. tons) of coal and the volume of oil delivered in the shipment,
 - d. A statement that the oil complies with the American Society for Testing and Materials specifications for fuel oil numbers 1 and 2, and/or for residual oil.
 - e. The sulfur content of the oil.
 - f. The % sulfur and % ash content of the coal along with the Btu content per shipment.
 - (9 VAC 5-50-410 and 9 VAC 5-80-110)
- 4. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:

Page 19

- a. The annual throughput of oil (in gallons) for the boiler (emission unit ID#: B3, BO 0301). The annual throughput shall be calculated as the sum of each consecutive twelve (12) month period.
- b. Opacity measurements and sulfur dioxide emission measurements from the continuous monitoring systems associated with condition V.B.1.
- c. All calibration records of the continuous monitoring systems (emission unit ID#: B3, BO 0301) associated with condition V.B.1.
- d. NO_x Stack Test Results as required by condition V.B.2.
- e. All fuel supplier certifications.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (9 VAC 5-50-50 and 9 VAC 5-80-110)

C. Reporting

- 1. Park 500 shall submit a written report listing the excess emissions recorded by its continuous monitors to the Director, Piedmont Regional Office every calendar quarter. Periods of excess emissions are defined as follows:
 - a. Any six-minute period during which the average opacity of emission exceeds 20 percent.
 - b. Any three-hour period during which the average emissions of sulfur dioxide (computed by taking the arithmetic average of any three contiguous one-hour periods) exceeds 2.51 lbs. per MMBtu.

All quarterly reports must include the information specified in 40 CFR Section 60.7(c). The reports shall be postmarked by the 30th day of the month following the end of the quarter.

(9 VAC 5-80-110 and Condition 12 of 8/23/04 Permit)

VI. Coal Handling and Storage Equipment (coal car shakers, coal crushers, various conveyors and silos), Ash Handling and Storage Equipment (cyclones, silos, and conveying systems), and Fly Ash Handling System (subset of Ash Handling Equipment) Requirements: (emission unit ID#s: CH0101, AH0101, and AH0101 stack ID# AE-43)

A. Limitations

1. **Emission Controls** – The fugitive coal dust emissions from the coal handling system (emission unit ID #: CH0101) shall be controlled by a wet spray dust suppression system rated at 90 percent control efficiency.

(9 VAC 5-80-110 and Condition 4 of 8/23/04 Permit)

- 2. **Emission Controls** Particulate emissions from the ash handling system (emission unit ID#: AH0101) shall be controlled by the following:
 - a. Primary Cyclone
 - b. Secondary Cyclone
 - c. Baghouse

These collectors are to be installed in series. Overall Efficiency will be 98 percent or better

(9 VAC 5-80-110 and Condition 5 of 8/23/04 Permit)

3. Particulate emissions from the fly ash handling system (emission unit ID#: AH0101, Stack ID#: AE-43) shall not exceed 0.02 lbs/hr or 0.08 tons per year. The visible emissions from the fly ash handling system (emission unit ID#: AH0101, Stack ID#: AE-43) shall not exceed 10 percent.

(9 VAC 5-80-110 and Condition 10 of 8/23/04 Permit)

4. Except as specified in condition VI.A.3, visible emissions from the coal handling and storage equipment (coal car shakers, coal crushers, various conveyors and coal silos) and ash handling and storage equipment (cyclones, silos, and conveying systems) (emission unit ID# CH0101 and AH0101) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.

(9 VAC 5-50-80 and 9 VAC 5-80-110)

B. Monitoring and Recordkeeping

1. The emissions from the fly ash handling system (emission unit ID #: AH0101 - stack ID#: AE-43)) shall be observed visually at least once a month for at least a brief time period during normal operations to determine if there are any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on each emissions unit/source. Each emissions unit/source observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.

(9 VAC 5-80-110)

Page 21

2. If any visible emissions evaluations as required by condition V.B.1. demonstrate visible emissions from the fabric filter (emission unit ID #: AH0101- stack ID#: AE-43) exceeding 5%, a differential pressure gauge shall be installed to continuously measure the differential pressure drop across the fabric filter. The differential pressure gauge shall be maintained in proper working order at all times by the permittee and the differential pressure shall be checked and recorded once a month during operation. If the pressure is outside of the manufacturer's recommendations, actions will be taken to determine the cause and records shall be kept to indicate what corrective actions were taken, if need be.

(9 VAC 5-80-110)

(9 VAC 5-80-110)

3. An annual inspection shall be conducted on the cyclones (emission unit ID #: AH0101) by the permittee to ensure structural integrity. Results of the inspection shall be kept and made available to the Department upon request. If any corrective actions were taken, records will be kept to indicate what corrective actions were taken and made available to the Department upon request.

4. Except as specified in condition VI.B.1., the emissions from the coal handling and storage equipment (coal car shakers, coal crushers, various conveyors and coal silos) and ash handling and storage equipment (cyclones, silos, and conveying systems) (emission unit ID #: CH0101 and AH0101(excluding stack ID#: AE-43)) shall be observed visually at least once each calendar month for at least a brief time period during normal operations to determine if there are normal visible emissions from each (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on each emissions unit/source. Each emissions unit/source observed having above normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.

(9 VAC 5-170-160, 9 VAC 5-80-110 E. and F.)

- 5. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
 - a. All visual emissions observations or 40 CFR 60, Appendix A. Method 9 visual evaluations as required in conditions VI.B.1 and 4.
 - b. Results of monitoring of air pollution control equipment, visual emission observations or evaluations of the coal handling and storage equipment (coal car shakers, coal crushers, various conveyors and coal silos) and ash handling and storage equipment (cyclones, silos, and conveying systems) (emission unit ID#s: CH0101 and AH0101).

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (9 VAC 5-50-50, 9 VAC 5-80-110)

VII. Combustion Equipment (Generators) Requirements – (emission unit ID# W1, EG0101, and W2, EG0101) and Receiving and Blending Area – (emission unit ID#s: DC0401 to DC0408, BW0401 to BW0408, DC0301 to DC0306 and DC0207, BW0301 to BW0307, HM0201 to HM0204 and HM0101 and BC0301)

A. Limitations

- 1. Particulate emissions from the Receiving and Blending Area (emission unit ID #s: DC0401 to DC0408, BW0401 to BW0408, DC0301 to DC0306 and DC0207, BW0301 to BW0307, HM0201 to HM0204 and HM0101 and BC0301) shall be controlled by two baghouses.
 - (9 VAC 5-80-110 and Condition 3 of 8/18/04 Permit)
- 2. The approved fuel for the generators (emission unit ID #s: W1, EG0101, and W2, EG0101) is diesel fuel. A change in the fuel may require a permit to modify and operate.
 - (9 VAC 5-80-110 and Condition 4 of 8/18/04 Permit)
- 3. The Receiving and Blending Area (emission unit ID #s: DC0401 to DC0408, BW0401 to BW0408, DC0301 to DC0306 and DC0207, BW0301 to BW0307, HM0201 to HM0204 and HM0101 and BC0301) shall process no more than 35.33 tobacco process units P5BB/yr, calculated as the sum of each consecutive twelve (12) month period.
 - (9 VAC 5-80-110 and Condition 6 of 8/18/04 Permit)
- 4. The annual throughput of diesel fuel to the two diesel generators (emission unit ID #s: W1, EG0101, and W2, EG0101) located at the Waste Water and Water Treatment Plant, shall not exceed 65,880 gallons per year, calculated as the sum of each consecutive 12-month period.
 - (9 VAC 5-80-110 and Condition 7 of 8/18/04 Permit)
- 5. The sulfur content of the diesel fuel to be burned in the generators (emission unit ID #s: W1, EG0101, and W2, EG0101) shall not exceed 0.5 percent by weight per shipment.
 - (9 VAC 5-80-110 and Condition 8 of 8/18/04 permit.)

Page 23

6. Total emissions from the operation of the generators (emission unit ID #s: W1, EG0101, and W2, EG0101) located at the Waste Water and Water Treatment Plant, shall not exceed the limits specified below:

TSP/PM-10	1.6 lbs/hr	0.5 tons/yr
Sulfur Dioxide	10.3 lbs/hr	2.3 tons/yr
Nitrogen Oxides (as NO ₂)	63.2 lbs/hr	14.2 tons/yr
Carbon Monoxide	16.6 lbs/hr	3.8 tons/yr
Volatile Organic Compounds	2.0 lbs/hr condition 9 of 8/18/04 Pern	0.5 tons/yr
() VAC 3-00-110, and C	Ondidon / Or 0/10/04 I CII	1111 <i>)</i>

7. Emissions from the operation of the consolidated blending and receiving area (emission unit ID #s: DC0401 to DC0408, BW0401 to BW0408, DC0301 to DC0306 and DC0207, BW0301 to BW0307, HM0201 to HM0204 and HM0101 and BC0301) shall not exceed the limits specified below:

TSP/PM-10	5.2 lbs/hr	11.4	tons/yr
Volatile Organic Compounds	9.6 lbs/hr	30.5	tons/yr
(9 VAC 5-80-110 and	Condition 10 of 8/1	8/04 Permit)	

8. Visible Emissions from the generators (emission unit ID #s: W1, EG0101, and W2, EG0101) and the Receiving and Blending area (emission unit ID #s: DC0401 to DC0408, BW0401 to BW0408, DC0301 to DC0306 and DC0207, BW0301 to BW0307, HM0201 to HM0204 and HM0101 and BC0301) shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction. (9 VAC 5-50-80, 9 VAC 5-80-110, and condition 11 of 8/18/04 Permit)

B. Monitoring and Recordkeeping

1. The baghouses for the Receiving and Blending Area (emission unit ID #s: DC0401 to DC0408, BW0401 to BW0408, DC0301 to DC0306 and DC0207, BW0301 to BW0307, HM0201 to HM0204 and HM0101 and BC0301) shall be provided with adequate access for inspection. Each baghouse shall be equipped with a device to continuously measure the differential pressure drop. The devices shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.

(9 VAC 5-80-110 and Condition 3 of 8/18/04 Permit)

Page 24

2. The emissions from the generators (emission unit ID#: W1, EG0101 and W2, EG0101) and Receiving and Blending Area (emission unit ID #s: DC0401 to DC0408, BW0401 to BW0408, DC0301 to DC0306 and DC0207, BW0301 to BW0307, HM0201 to HM0204 and HM0101 and BC0301) shall be observed visually at least once a month for at least a brief time period during normal operations to determine if there are normal visible emissions from each (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on each emissions unit/source. Each emissions unit/source observed having above normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.

(9 VAC 5-170-160, 9 VAC 5-80-110 E. and F.)

- 3. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
 - a. The total yearly throughput of diesel fuel for the generators (emission unit ID #s: W1, EG0101, and W2, EG0101), calculated as the sum of each consecutive 12 month period.
 - b. The yearly throughput of tobacco process P5BB (emission unit ID #s: DC0401 to DC0408, BW0401 to BW0408, DC0301 to DC0306 and DC0207, BW0301 to BW0307, HM0201 to HM0204 and HM0101 and BC0301), calculated as the sum of each consecutive 12 month period.
 - c. Diesel fuel shipments purchased, indicating the sulfur content per shipment.
 - d. Results of visual emissions observations or 40 CFR 60, Appendix A Method 9 visible emission evaluation as required in condition VII.B.2.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, 9 VAC 5-80-110, and condition 12 of 8/18/04 Permit)

Page 25

VIII. Pulping (pneumatic transfer) (emission unit ID#: L1CY0101, L1CY0102, L2CY0101 and L2CY0102), Tobacco Drying Requirements— (emission unit ID# L1 DD0101, L1 DT0101, L1 DR0101, L2DD0101, L2DT0101, and L2DR0101) and Packing Requirements— (emission unit ID# L1 PP0101 & L1PP0102 and L1 PP0201 & L1PP0202)

A. Limitations

 Visible emissions from the Pulping (pneumatic transfer) (emission unit ID#: L1CY0101, L1CY0102, L2CY0101 and L2CY0102), Tobacco Drying – (emission unit ID# L1 DD0101, L1 DT0101, L1 DR0101, L2DD0101, L2DT0101, and L2DR0101) and Packing – (emission unit ID# L1 PP0101 & PP0102 and L1 PP0201 & PP0202) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
 (9 VAC 5-50-80 and 9 VAC 5-80-110)

B. Monitoring and Recordkeeping

1. The emissions from the Pulping (pneumatic transfer) (emission unit ID#: L1CY0101, L1CY0102, L2CY0101 and L2CY0102), Tobacco Drying – (emission unit ID# L1 DD0101, L1 DT0101, L1 DR0101, L2DD0101, L2DT0101, and L2DR0101) and Packing – (emission unit ID# L1 PP0101 & PP0102 and L1 PP0201 & PP0202) shall be observed visually at least once a month for at least a brief time period during normal operations to determine if there are normal visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit Pulping (pneumatic transfer) (emission unit ID#: L1CY0101, L1CY0102, L2CY0101 and L2CY0102), Tobacco Drying – (emission unit ID# L1 DD0101, L1 DT0101, L1 DR0101, L2DD0101, L2DT0101, and L2DR0101) and Packing – (emission unit ID# L1 PP0101 & PP0102 and L1 PP0201 & PP0202) observed having above normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.

(9 VAC 5-170-160, 9 VAC 5-80-110 E. and F. of State Regulations)

- 2. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
 - a. Results of visual emissions observations or 40 CFR 60, Appendix A Method 9 visible emission evaluations as required in condition VIII.B.1.

Page 26

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (9 VAC 5-50-50 and 9 VAC 5-80-110)

IX. Tobacco Drying and Packing and Process Ventilation Process Equipment Requirements – (emission unit ID# L3 DD0101, L3 DT0101, L3 DR0101, and L3 PP0101, PP0102, & PP0103)

A. Limitations

- 1. **Emission Controls** Particulate emissions shall be controlled by baghouses and wet scrubbers (emission unit ID# L3 DD0101, L3 DT0101, L3 DR0101, and L3 PP0101, PP0102, PP0103) at the appropriate locations. The baghouses and wet scrubbers shall be provided with adequate access for inspection and shall be in operation when the corresponding process is operating.
 - (9 VAC 5-80-110 and Condition 3 of 6/30/04 Permit)
- 2. The production through tobacco process line (emission unit ID# L3 DD0101, L3 DT0101, L3 DR0101, and L3 PP0101, PP0102, PP0103) shall not exceed 19.92 tobacco process P5PB units/yr, calculated monthly as the sum of each consecutive twelve (12) month period.
 - (9 VAC 5-80-110 and Condition 4 of 6/30/04 Permit)
- 3. Emissions from the operation of the Packing and Process Ventilation (emission unit ID#: L3PP0101, L3PP0102, L3PP0103) combined shall not exceed the limits specified below:

Particulate Matter 1.284 lbs/hr 5.39 tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 5 of 6/30/04 Permit)

4. Emissions from the Tobacco Drying operation (emission unit ID#: L3DD0101, L3DT0101, L3DR0101) shall not exceed the limits specified below:

Particulate Matter 3.93 lbs/hr 16.51 tons/yr

(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 6 of 6/30/04 Permit)

5. Visible emissions from the tobacco process line (emission unit ID# L3 DD0101, L3 DT0101, L3 DR0101, and L3 PP0101, PP0102, PP0103) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.

(9 VAC 5-50-80 and 9 VAC 5-80-110)

Page 27

B. Monitoring and Recordkeeping

1. The fabric filter (emission unit ID# L3 PP0101, PP0102, and PP0103) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. (9 VAC 5-80-110)

- 2. The emissions from the tobacco process line (emission unit ID# L3 DD0101, L3 DT0101, L3 DR0101, and L3 PP0101, PP0102, PP0103) shall be observed visually at least once a month for at least a brief time period during normal operations to determine if there are normal visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit (emission unit ID# L3 DD0101, L3 DT0101, L3 DR0101, and L3 PP0101, PP0102, PP0103) observed having above normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
 - (9 VAC 5-170-160, 9 VAC 5-80-110 E. and F. of State Regulations)
- 3. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Region. These records shall include, but are not limited to:
 - a. Annual production through tobacco process line (emission unit ID# L3 DD0101, L3 DT0101, L3 DR0101, and L3 PP0101, PP0102, PP0103) P5PB units, calculated monthly as the sum of each consecutive twelve (12) month period.
 - b. Results of visual emission observations or 40 CFR 60, Appendix A Method 9 visible emissions evaluation as required in condition IX.B.2.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50 and 9 VAC 5-80-110 and condition 7 of 6/30/04 permit)

X. Dry Tobacco Flavoring Operation Process Equipment which includes the Blending and Holding Tanks Requirements – (emission unit ID# L3, TK4501, L3 MT0801), Dry Tobacco Flavoring Dump Station (emission unit ID#: L3 TK4601) and two propylene glycol storage tanks (emission unit ID#: TK4901 & TK4902)

Page 28

A. Limitations

Particulate emissions from the dry tobacco flavoring dump station (emission unit ID #: L3 TK4601) shall be controlled by a fabric filter.
 (9 VAC 5-80-110 and Condition 3 of 8/19/04 Permit)

- 2. The dry tobacco flavoring operation (emission unit ID#: L3 TK4601) shall consume no more than 350,000 pounds per year of dry flavor ingredient, calculated as the sum of each consecutive twelve (12) month period.

 (9 VAC 5-80-110 and Condition 5 of 8/19/04 Permit)
- 3. The annual throughput of propylene glycol (emission unit ID#: TK4901 & TK4902) associated with the dry flavoring operation shall not exceed 365,000 gallons, calculated as the sum of each consecutive twelve (12) month period. (9 VAC 5-80-110 and Condition 6 of 8/19/04 Permit)
- 4. Visible emissions from the fabric filter (for the dry tobacco flavoring dump station) (emission unit ID #: L3 TK4601)) shall not exceed 5% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

 (9 VAC 5-50-80, 9 VAC 5-80-110 and Condition 8 of 8/19/04 Permit)
- 5. Emissions from the operation of the dry tobacco flavoring operation (emission unit ID#: L3, TK4501, L3 MT0801, TK4901 & TK4902, and L3 4601) shall not exceed the limits specified below:

Particulate Matter	0.1 lbs/hr	0.5 tons/yr
PM-10	0.1 lbs/hr	0.5 tons/yr
Volatile Organic Compounds	0.4 lbs/hr	1.6 tons/yr

(9 VAC 5-80-110 and Condition 7 of 8/19/04 Permit)

B. Monitoring and Recordkeeping

1. The fabric filter for the dry tobacco flavoring dump station (emission unit ID #: L3 4601) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. The fabric filter shall be provided with adequate access for inspection.

(9 VAC 5-80-110 and Condition 3 of 8/19/04 Permit)

Page 29

2. The emissions from the dry tobacco flavoring dump station's (emission unit ID #: L3 TK4601) shall be observed visually at least once a month for at least a brief time period during normal operations to determine if there are any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.

(9 VAC 5-170-160, 9 VAC 5-80-110 E. and F. of State Regulations)

- 3. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - a. The yearly throughput of propylene glycol (emission unit ID#: TK4901, & TK4902), calculated as the sum of each consecutive twelve (12) month period.
 - b. The annual consumption of dry flavor ingredient (emission unit ID#: L3 TK4601), calculated as the sum of each consecutive twelve (12) month period.
 - c. Results of visual emissions observations or 40 CFR 60, Appendix A Method 9 visible emission evaluations as required in condition X.B.2.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, 9 VAC 5-80-110, and Condition 9 of 8/19/04 Permit)

Page 30

XI. Facility Wide Conditions

A. Requirements by Reference

1. Except where this permit is more restrictive than the applicable requirement, all applicable MACT DDDDD equipment shall be operated in compliance with the requirements of 40 CFR 63, Subpart DDDDD by the dates specified in 40 CFR 63, Subpart DDDDD.

(9 VAC 5-60-90, 9 VAC 5-60-100 and 9 VAC 5-80-110)

2. Except where this permit is more restrictive than the applicable requirement, all applicable NSPS Subpart Y equipment shall be operated in compliance with the requirements of 40 CFR 60, Subpart Y.

(9 VAC 5-60-90, 9 VAC 5-60-100 and 9 VAC 5-80-110)

B. Limitations

RACT Agreement issued 3/26/97 (for the Reconstituted Leaf Facility):

- 1. VOC emissions from the affected facility shall be controlled as outlined in this agreement. (Section D.8. states: Since it is not economically feasible to control VOC emissions from any of the tobacco processing operations at the affected facility, RACT for the entire facility is determined to be no control.)
 - (9 VAC 5-80-110 and Condition 1 of Section E of RACT Order dated 3/26/97)
- 2. Philip Morris shall comply with all applicable SAPCB Regulations including the requirements for notification, recordkeeping, and reporting.
 - (9 VAC 5-80-110 and Condition 2 of Section E of RACT Order dated 3/26/97)

C. Monitoring and Recordkeeping

RACT Agreement issued 3/26/97 (for the Reconstituted Leaf Facility):

- 1. Philip Morris shall maintain records of all operating parameters necessary to demonstrate compliance. These records shall be maintained for all processes and include, but are not limited to the following:
 - a. Annual throughput records for all tobacco processing equipment at the affected facility (Reconstituted Leaf (R/L) Plant).
 - b. Annual emission estimates for all tobacco processing equipment at the affected facility (Reconstituted Leaf (R/L) Plant).

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Condition 3 of Section E of RACT Order dated 3/26/97)

D. Testing

- 1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

 (9 VAC 5-50-30 and 9 VAC 5-80-110)
- 2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

The following table is only required for those pollutants that have emission limits.

Pollutant	Test Method (40 CFR Part 60, Appendix A)	
VOC	EPA Methods 18, 25, 25a	
VOC Content	EPA Methods 24, 24a	
NO_x	EPA Method 7	
SO_2	EPA Method 6	
СО	EPA Method 10	
PM/PM-10	EPA Method 5, 17	
Visible Emission	EPA Method 9	

(9 VAC 5-80-110)

XII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission	Emission Unit	Citation	Pollutant(s) Emitted	Rated Capacity	
Unit No.	Description	Chanon	(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)	
	StorageTanks				
B1			1		
TK1001	Emerg. Gen Day Tank	9 VAC 5-80-720 B	VOC	NA	
TK1201	No.2 Fuel Oil, Bulk Storage	9 VAC 5-80-720 B	VOC	NA	
TK0801	Used Oil	9 VAC 5-80-720 B	VOC	NA	
TK1101	Emerg. Gen. Bulk Storage	9 VAC 5-80-720 B	VOC	NA	
B2					
TK0601	Lube Oil Reservoir	9 VAC 5-80-720 B	VOC	N/A	
TK0602	Lube Oil Conditioner	9 VAC 5-80-720 C	VOC	155 gal.	
TK0701	Lube Oil Reservoir	9 VAC 5-80-720 B	VOC	N/A	
TK0702	Lube Oil Conditioner	9 VAC 5-80-720 C	VOC	215 gal.	
B100					
TK0101	B100 Emerg Gen Day Tank	9 VAC 5-80-720 B	VOC	NA	
L 1				<u> </u>	
TK2801	Emerg. Gen. Day Tank, ART Bldg.	9 VAC 5-80-720 B	VOC	NA	
TK2901	Emerg. Fire Pump Day Tank	9 VAC 5-80-720 B	VOC	NA	
L 3					
TK2201 & 2301	Tanks (Out of Service)	9 VAC 5-80-720 B	VOC	NA	
TK2401	Bulk Storage Tank	9 VAC 5-80-720 B	VOC	NA	
TK4701- 4702 TK4801- 4802	Bulk Storage Tanks	9 VAC 5-80-720 B	VOC	NA	
W1					
TK0601	Generator, Bulk Storage	9 VAC 5-80-720 B	VOC	NA	
TK0701	Unleaded Gasoline	9 VAC 5-80-720 B	VOC	NA	
TK0801	Vehicle Fueling Diesel Tank	9 VAC 5-80-720 B	VOC	NA	
TK0501	WTP Gen. Day Tank	9 VAC 5-80-720 B	VOC	NA	
PX0101	WTP Gen. Supply Line	9 VAC 5-80-720 B	VOC	NA	
W2			•	•	
TK0201, TK0501	Bulk Storage Tanks	9 VAC 5-80-720 B	VOC	NA	

Emission	Emission Unit	Citation	Pollutant(s) Emitted	Rated Capacity
Unit No.	Description	Citation	(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)
& 0502				
TK1101				
TK0701	WWTP Generator Day Tank	9 VAC 5-80-720 B	VOC	NA
PX0101	WWTP Generator Supply Line	9 VAC 5-80-720 B	VOC	NA
MT0401- 0402	WWTP Day Tanks	9 VAC 5-80-720 B	VOC	NA
Process Ed	quipment	1		l
L1				
MT0101- 0102	Tanks	9 VAC 5-80-720 B	VOC	NA
TK0101	Tank	9 VAC 5-80-720 B	VOC	NA
TK2301	Tank	9 VAC 5-80-720 B	VOC	NA
TK0201	Tank	9 VAC 5-80-720 B	VOC	NA
TK2501-				
2503				
TK2401-	Tanks	9 VAC 5-80-720 B	VOC	NA NA
2403	Tunks	7 VIIC 3 00 720 B	100	1471
MT0201-				
0202				
SS0101-	Screens	9 VAC 5-80-720 B	VOC	NA
0104 TK0301	Tank	9 VAC 5-80-720 B	VOC	NA
TK0401-	Feed Tanks	9 VAC 5-80-720 B	VOC	NA
0402				
TK1501	Level Box	9 VAC 5-80-720 B	VOC	NA
SK0101- 0102	Rejects Tanks	9 VAC 5-80-720 B	VOC	NA
EV0101- 0103	Evaporators	9 VAC 5-80-720 B	VOC	NA
ST0101	Tank	9 VAC 5-80-720 B	VOC	NA
CT0101- 0102	Cooling Towers	9 VAC 5-80-720 B	VOC	NA
TK0601- 0602	Feed Tanks	9 VAC 5-80-720 B	VOC	NA
TK1601,				
1701 &	Standpipes	9 VAC 5-80-720 B	VOC	NA
1801				
TK2201	Tank	9 VAC 5-80-720 B	VOC	NA
TK0701-				
TK0702	T 1	0.114.0.5.00.500.5	NOC	374
TK1101-	Tanks	9 VAC 5-80-720 B	VOC	NA
1103				
TK0501				
MT0301, MT0401, TK1201	Tanks	9 VAC 5-80-720 B	VOC	NA

Emission	Emission Unit	Citation	Pollutant(s) Emitted	Rated Capacity
Unit No.	Description	Citation	(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)
TK1901,				
2001,	Flavor Tanks	9 VAC 5-80-720 B	VOC	NA
2101 &	The vor Tunks	7 THE 3 00 720 B	100	1111
3001				
TK0801,				
0901,				
1401,				
BX0101,				
0201,	Sheet Forming	9 VAC 5-80-720 B	VOC	NA
0301	Equipment			
FP0101,				
SS0201				
&				
LD0101	G 11 T 1	0.111.0.5.00.500.5	NOG	37.4
TK1301	Scrubber Tank	9 VAC 5-80-720 B	VOC	NA
SK0201-				
0202	Tanks	9 VAC 5-80-720 B	VOC	NA
TK1001-				
1002		0 XIA C 7 00 700 D	Mod	37.4
ST0201	Tank	9 VAC 5-80-720 B	VOC	NA
L2		1	T	T
MT0101-	Tanks	9 VAC 5-80-720 B	VOC	NA
0102	/ 1	0 MA C 5 00 700 D	NOC	NT A
TK0101	Tank	9 VAC 5-80-720 B	VOC	NA
TK2201	Tank	9 VAC 5-80-720 B	VOC	NA
TK0201	Tank	9 VAC 5-80-720 B	VOC	NA
TK3101- 3103				
TK2301-				
2303	Tanks	9 VAC 5-80-720 B	VOC	NA
MT0201-				
0202				
SS0101-				
0104	Screens	9 VAC 5-80-720 B	VOC	NA
TK0301	Tank	9 VAC 5-80-720 B	VOC	NA
TK0401-				
0402	Feed Tanks	9 VAC 5-80-720 B	VOC	NA
TK1501	Level Box	9 VAC 5-80-720 B	VOC	NA
SK0101-				
0102	Rejects Tanks	9 VAC 5-80-720 B	VOC	NA
EV0101-	Examenators	0 VAC 5 00 700 B	VOC	NIA
0103	Evaporators	9 VAC 5-80-720 B	VOC	NA
ST0101	Tank	9 VAC 5-80-720 B	VOC	NA
CT0101-	Cooling Toward	9 VAC 5-80-720 B	VOC	NA
0102	Cooling Towers	9 VAC 3-80-120 B	100	NA
TK0601-	Feed Tanks	9 VAC 5-80-720 B	VOC	NA
0602	1 CCU TallKS			11/1
TK1801,	Standpipes	9 VAC 5-80-720 B	VOC	NA

Emission	Emission Unit	C':	Pollutant(s) Emitted	Rated Capacity
Unit No.	Description	Citation	(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)
1901 &	•			
2001				
TK1701	Tank	9 VAC 5-80-720 B	VOC	NA
TK1301	Supply Tank	9 VAC 5-80-720 B	VOC	NA
TK0701-				
0702				
TK1101-	Tanks	9 VAC 5-80-720 B	VOC	NA
1103				
TK0501				
MT0301,				
TK1201,				
2601,	Tanks	9 VAC 5-80-720 B	VOC	NA
2701,				
2801				
TK2401				
&	Flavor Tanks	9 VAC 5-80-720 B	VOC	NA
TK3201				
TK0801,				
0901,				
1401,				
BX0101,	Sheet Forming	0 114 G 5 00 500 B	MOG	37.4
0201,	Equipment	9 VAC 5-80-720 B	VOC	NA
0301,				
FP0101;				
SS0201,				
LD0101 TK2901	Scrubber Tank	9 VAC 5-80-720 B	VOC	NA
SK0201-	Scrubber Talik	9 VAC 3-60-720 B	VOC	IVA
0202				
TK1001-	Tanks	9 VAC 5-80-720 B	VOC	NA
1002				
ST0201	Tank	9 VAC 5-80-720 B	VOC	NA
CT0201	Cooling Tower	9 VAC 5-80-720 B	VOC	NA
L3	Cooming Tower	/ VAC 3-00-120 D	100	11/1
TK2001	Tank	9 VAC 5-80-720 B	VOC	NA
TK1901	Tank	7 VAC 3-00-120 D	100	11/1
MT0401-	Tanks	9 VAC 5-80-720 B	VOC	NA
0402	2 421110	, 1110 5 00 120 B		- '
TK1001,				
2101-				
2102,	Tanks	9 VAC 5-80-720 B	VOC	NA
MT0101-				/- =
0102				
TK0301-				
0303	T. 1	0.11.0.5.00.500.5	TIO G	374
TK1101-	Tanks	9 VAC 5-80-720 B	VOC	NA
1103				
TK3801	Tank	9 VAC 5-80-720 B	VOC	NA

Emission	Emission Unit	C':	Pollutant(s) Emitted	Rated Capacity
Unit No.	Description	Citation	(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)
TK0801-				
0803				
TK0901	Tanks	9 VAC 5-80-720 B	VOC	NA
TK1201-				
1203		0.111.0.5.00.500.5	110.0	37.4
TK0201	Level Box	9 VAC 5-80-720 B	VOC	NA
TK0401-				
0402	Tanks	9 VAC 5-80-720 B	VOC	NA
SK0201- 0202				
TK0501-				
0502	Feed Tanks	9 VAC 5-80-720 B	VOC	NA
EV0101-				
0103	Evaporators	9 VAC 5-80-720 B	VOC	NA
ST0101	Tank	9 VAC 5-80-720 B	VOC	NA
CT0101-		9 VAC 5-80-720 B	VOC	NA
0102	Cooling Towers (2)	9 VAC 5-80-720 B	VOC	INA
PU0101	Pump	9 VAC 5-80-720 B	VOC	NA
EV0201	Evaporator	9 VAC 5-80-720 B	VOC	NA
CT0201	Cooling Tower	9 VAC 5-80-720 B	VOC	NA
TK2501	Tank	9 VAC 5-80-720 B	VOC	NA
MT0301,				
TK1301,				
3001,	Tanks	9 VAC 5-80-720 B	VOC	NA
3201 &				
3301				
TK2901	Flavor Tanks	9 VAC 5-80-720 B	VOC	NA
& TK3101	riavoi Taliks	9 VAC 3-80-720 B	VOC	INA
TK0601-				
0602				
TK0701-				
0703	Tanks	9 VAC 5-80-720 B	VOC	NA
&				
TK1501				
TK2601	Standnings	9 VAC 5-80-720 B	VOC	NA
& 2701	Standpipes	7 VAC 3-00-120 B	VUC	INA
MT0501,				
TK1601,				
1401 &				
2801,	GI . F			
BX0101-	Sheet Forming	9 VAC 5-80-720 B	VOC	NA
0301,	Equipment			
FP0101; SS0201-				
0202;				
LD0101				
SK0101	Tanks	9 VAC 5-80-720 B	VOC	NA
2120101	1 GIIIG	7 TIC 3-00-120 D	, 50	1111

Emission	Emission Unit	G' · · · ·	Pollutant(s) Emitted	Rated Capacity
Unit No.	Description	Citation	(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)
TK1701-	(5 1222 23 123 2)			
1702				
ST0201	Tank	9 VAC 5-80-720 B	VOC	NA
CT0301	Cooling Tower	9 VAC 5-80-720 B	VOC	NA
TK4001-				
4101				
TK4301-	Flavor Tanks	9 VAC 5-80-720 B	VOC	NA
4401				
W2				
TK0101-	WWTP Equalization			1
0102	Basins	9 VAC 5-80-720 B	VOC	NA
	Basins			
LD0101-				
0102				
LD0201-	WWTP Bar Racks,			
0202	Grit Chambers,			
LD0301-	Screens,	9 VAC 5-80-720 B	VOC	NA
0302	Primary Clarifiers, and			
LD0401-	Thickeners			
0405	Thekeners			
LD0501-				
0503				
MT0101-	WWTP Aeration	9 VAC 5-80-720 B	VOC	NA
0105	Basins	9 VAC 3-80-720 B	VOC	NA
N/TF0201	WWTP Flocculation	0 V A C 5 00 700 D	NOC	NIA
MT0201	Tank	9 VAC 5-80-720 B	VOC	NA
LD0601-	WWTP Secondary	0 M A C 7 00 700 D	MOG	NTA
0606	Clarifiers	9 VAC 5-80-720 B	VOC	NA
MT0301-	WWTP Chlorine	0.114.6.7.00.700.70	TIOG	27.4
0302	Contact Tanks	9 VAC 5-80-720 B	VOC	NA
SF0301-				
0306	WWTP Gravity Filters	9 VAC 5-80-720 B	VOC	NA
MT0501,				
TK0901	Tanks	9 VAC 5-80-720 B	VOC	NA
	Generators/Pump			
024B1	Boiler House	T		
EG0101		9 VAC 5-80-720 C	NA	298 hp (200 kW)
	Emergency Generator Boiler House			
024 B1		9 VAC 5-80-720 C	NA	298 hp (200 kW)
EG0102	Emergency Generator			- '
024 L1	ART Pilot Plant	9 VAC 5-80-720 C	NA	55 hp (37 kW)
EG0101	Emergency Generator			- r (2)
024 L1	Fire System Emergency	9 VAC 5-80-720 C	NA	142 hp
EG0201	Pump	7 1110 0 00 120 0		p
041 L1	Bermuda Hundred –	9 VAC 5-80-720 C	NA	372 hp (250 kW)
EG0101	Emergency Generator	7 VAC 3-00-120 C	11/17	312 np (230 k W)
Miscellaneous Operations				
EH0101-	Maintenance Shop	0 MA C 5 00 700 P	VOC DM DM10	NIA
0103	Exhaust Hoods	9 VAC 5-80-720 B	VOC, PM, PM10	NA
Various	Shop Parts Washers	9 VAC 5-80-720 B	VOC	NA
, 411046	2110p ratio (rabileto	, , , , , , , , , , , , , , , , , , ,	1 . 0 0	- 1

Page 38

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
Various	Hydraulic Oil Tanks	9 VAC 5-80-720 B	VOC	NA
	Warehouses (3)	9 VAC 5-80-720 B	HAP	NA

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR Part 63, Subpart ZZZZ	National Emissions Standards for	The affected diesel generators are
	Hazardous Air Pollutants for	compression ignition (CI) units,
	Reciprocating Internal	they are exempt from all rule
	Combustion Engines (RICE	requirements and all
	MACT)	requirements under the General
		Provisions of Part 63, subpart A

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law. (9 VAC 5-80-140)

XIII. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

- 1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- 2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
- 3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
- 4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- 5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

- 1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.
 - (9 VAC 5-80-110 F)
- Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (9 VAC 5-80-110 F)
- 3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than <u>March 1</u> and <u>September 1</u> of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- 1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- 2. The identification of each term or condition of the permit that is the basis of the certification.
- 3. The compliance status.
- 4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- 5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- 6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00) U. S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

Page 42

E. Permit Deviation Reporting

The permittee shall notify the Director, PRO Region within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition XIII.C.3. of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, PRO Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, PRO Region. (9 VAC 5-20-180 C)

- 1. The emission units that have continuous monitors subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not subject to the 14 day written notification.
- 2. The emission units subject to the reporting and the procedure requirements of 9 VAC 5-40-50 C and the procedures of 9 VAC 5-50-50 C are listed below:
 - a. Babcock & Wilcox Boiler, (emission unit ID#: B1, BO 0501)
 - b. Babcock & Wilcox Boiler, (Stirling Power) Wall Fired (emission unit ID#: B2, BO 0201)
 - c. Combustion Engineering Tangentially Fired Boiler, (emission unit ID #: B3, BO 0301)
- 3. Each owner required to install a continuous monitoring system subject to 9 VAC 5-40-41 or 9 VAC 5-50-410 shall submit a written report of excess emissions (as defined in the applicable emission standard) to the board for every calendar quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter and shall include the following information:

- a. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h) or 9 VAC 5-40-41 B 6, any conversion factors used, and the date and time of commencement and completion of each period of excess emissions;
- Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the source. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted;
- c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments; and
- d. When no excess emissions have occurred or the continuous monitoring systems have not been inoperative, repaired or adjusted, such information shall be stated in the report.
- 4. All malfunctions of emission units not subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C require written reports within 14 days of the discovery of the malfunction.

(9 VAC 5-20-180 C and 9 VAC 5-50-50)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

Page 44

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

L. Duty to Submit Information

- 1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality. (9 VAC 5-80-110 G.6)
- 2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G. (9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

Page 45

- 1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
- 2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
- 4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- 5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- 1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- 2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- 3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- 1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- 2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

Page 47

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another. (9 VAC 5-80-160)

- 2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)
- 3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

- 1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
- 2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit

requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

- 3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
- 4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations. (9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. (9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).

(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- 1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
- 2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- 3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)